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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

DANICA LOVE BROWN, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

STORED VALUE CARDS, INC. (d/b/a NUMI  
FINANCIAL); and CENTRAL NATIONAL  
BANK AND TRUST COMPANY, ENID,  
OKLAHOMA,

Defendant.

No. 3:15-cv-1370-MO

**JOINT MOTION FOR EXTENSION  
OF PRETRIAL DISCOVERY DEADLINES**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“Fed. R. Civ. P.”) and Local Rule 16-3(a), Plaintiff Danica Love Brown and Defendants Stored Value Cards, Inc. (“SVC”) and Central National Bank and Trust (“CNB”), Enid, Oklahoma, hereby respectfully move this Court to grant an extension of certain pretrial discovery deadlines. In relevant part, the parties request extending the fact discovery deadline and the motion to compel deadline by two months, from February 2, 2018 to April 2, 2018, extending the trial expert deadlines by 6 weeks,

and extending the trial expert depositions by 5 weeks. If this motion is granted, neither the class certification motion deadline nor the dispositive motion deadline would be changed.

The grounds for this motion are as follows:

1. On June 20, 2017, the Court entered Minutes of Proceedings (Dkt. #140), in which the Court adopted Plaintiff's Proposed Scheduling Order (Dkt. #125). Among other things, the scheduling order set forth deadlines for fact and expert discovery and dispositive motions.

2. In order to give the parties sufficient time to complete written fact discovery, depositions, and obtain deposition transcripts before expert disclosures or class certification briefs are due, the parties respectfully request an extension of certain discovery deadlines consistent with the table set out below. As noted above, if this motion is granted, the class certification deadline and the dispositive motion deadline would remain unchanged.

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Fact Discovery	February 2	April 2 (+2 months)
Motion to Compel Deadline	February 23	April 23 (+2 months)
Plaintiff Trial Expert	April 6	May 11 (+6 weeks)
Defendant Trial Expert	May 4	June 15 (+6 weeks)
Plaintiff Trial Expert Depo	May 18	June 22 (+5 weeks)
Defendant Trial Expert	June 15	July 20 (+5 weeks)
Plaintiff Class Cert Motion	June 1	June 1
Dispositive Motion	August 3	August 3

3. The parties have been working diligently and cooperatively to complete written discovery in this matter, including negotiating electronic records custodians and electronic records search terms, and participating in numerous meet and confers to resolve outstanding discovery disputes concerning Plaintiff's First Request for Production of Documents to Central National Bank, and Plaintiffs' First Request for Production to Defendant Stored Value Cards, Inc.

4. To date, Defendant CNB has produced to Plaintiffs 40,189 pages of documents. Additional documents remain to be produced by Defendant CNB. Defendant SVC has produced 42,089 pages of documents to Plaintiffs in addition to a voluminous Excel spreadsheet containing data. Defendant SVC is in the process of reviewing an additional 75,000 email documents for production to Plaintiff and anticipates completing production of those documents by the end of January, 2018.

5. Defendants deposed Plaintiff Danica Brown in September 2017, and on December 29, 2017, Defendant Stored Value Card Inc. issued a Request for Production of Documents to Plaintiff Brown.

6. There are currently five depositions scheduled for January of 2018 in this matter, including the depositions of Defendant Central National Bank employees Scott Shyrock, Dennis Gerhard, and a Rule 30(b)(6) deposition of Defendant Central National Bank during the week of January 8, and the depositions of Defendant Stored Value Cards employees Michele Dominguez and Karen Mossman during the week of January 22. The parties anticipate noticing additional depositions in this matter later this month.

Respectfully submitted this 9<sup>th</sup> day of January, 2018.

<p><b>KELLER ROHRBACK L.L.P.</b></p> <p>By: <u>s/ Laura Gerber</u>  Daniel Mensher, OSB #074636  Mark A. Griffin, Pro Hac Vice  Laura R. Gerber, Pro Hac Vice  Lisa Faye Petak, Pro Hac Vice  1201 Third Avenue, Suite 3200  Seattle, WA 98101-3052</p> <p><b>BENJAMIN HAILE ATTORNEY AT LAW</b>  Benjamin Haile  P.O. Box 2581  Portland, OR 97208</p>	<p><b>FOX ROTHSCHILD LLP</b></p> <p>By: <u>s/ Eric Nystrom</u>  Eric J. Nystrom, Pro Hac Vice  222 South 9<sup>th</sup> Street, Suite 2000  Minneapolis, MN 55402</p> <p><b>HITT HILLER MONFILS WILLIAMS LLP</b>  James L. Hiller, OSB #772220  411 SW Second Avenue, Suite 400  Portland, OR 97204</p> <p><i>Attorneys for Central National Bank and Trust</i></p>
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